

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 2:19-cr-00013
)
) Chief Judge Crenshaw
)
)
GEORGIANNA A.M. GIAMPIETRO)

v.

UPDATED NOTICE RE: DISCOVERY

The United States, through the United States Attorney for the Middle District of Tennessee, and pursuant to the earlier directive of the Court, hereby notifies the Court of the discovery that has been provided in this case to date and / or has otherwise been made available to the defendant in compliance with the Court’s prior Order (D.E. 89). The government requests leave to supplement and amend as necessary, consistent with the Court’s extension Order (D.E. 93).

Specifically, the government has provided the contents of “Production 1,” “Production 2,” “Production 3,” “Production 4,” “Production 5,” “Production 6,” “Production 7,” “Production 8,” “Production 9,” and “Production 10,” as further set forth herein.¹

Production 1 – (consisting of a single flash drive):

- The contents of GIAMPIETRO’s Facebook accounts, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018;
- The contents of GIAMPIETRO’s Instagram accounts, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018
- The contents of additional Instagram accounts associated with GIAMPIETRO,

¹ The government’s productions were made subject to the terms of the original protective order entered in this case with the understanding and agreement of defense counsel.

obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 11, 2018

- The contents of GIAMPIETRO's Google account (associated with email address gergiannagiampieto@gmail.com), obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on March 1, 2019
- The contents of GIAMPIETRO's Samsung S5 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's Samsung S8 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's laptop computer, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of four thumb drives, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- A redacted transcript of an interview of GIAMPIETRO on October 23, 2018, conducted in connection with the execution of a search warrant at her residence on that date

Production 2 – (consisting of six (6) binders and representing Binders 1-6, which includes eight (8) discs):

- 1 Disc with Content of Tablet (30 GB)
- Search Warrant Affidavit for Facebook accounts is available for inspection and review
- Search Warrant Affidavit for Instagram accounts is available for inspection and review
- Search Warrant Affidavit for Google account is available for inspection and review
- Search Warrant Affidavit for Giampietro's Residence is available for inspection and review

- Subpoena results from social media, telephone, education, financial, and other providers (Binders 1, 2, and 3 that include seven (7) discs)
- Case Initiation Report
- Report of Online Communications with Giampietro October 2015
- Report of Online Communications with Giampietro November 2016
- Report of Online Activity of Giampietro February 2016
- Report of Online Activity of Giampietro March 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro March-April 2017
- Report of Private Chats with Giampietro May 2016
- Report of Text Messages with Giampietro November 2017
- Report of Undercover Meeting with Giampietro November 2017
- Report of Undercover Meeting with Giampietro February 2018 (part 1)
- Report of Undercover Meeting with Giampietro February 2018 (part 2)
- Report of Online Chat with Giampietro September 26, 2018, and associated messages
- Report of Online Chat with Giampietro September 23-24, 2018, and associated messages
- Online Communications with @Alsadaqahsyria October 2018
- Report of Online Chat with Giampietro September 30, 2018, and associated messages
- Report of Online Chat with Giampietro October 1-2, 2018, and associated messages
- Report of Online Chat with Giampietro October 3-4, 2018, and associated messages
- Online Chat with Giampietro October 11, 2018

- Documenting Photographs Obtained During Search of Giampietro's Residence
- Report of Online Communication with Giampietro Between May 3, 2018 and September 12, 2018, and associated messages
- Proffer with Giampietro December 2018
- Report of Interview of Giampietro October 2018 (part 1)
- Report of Interview of Giampietro October 2018 (part 2)
- Journal Excerpt from Evidence Collected at Giampietro's Residence
- Deleted Messages Found on Giampietro's Cell Phone
- Online Post Made by Giampietro Warning Followers Found on Cell Phone
- Open Source Information on Al-Sadaqah
- Text Messages Obtained Between Giampietro and a Chat Group Associate
- Reverse Proffer with Giampietro in April 2019
- Online Warning Found on Giampietro's Cell Phone
- Search Warrant Return from Search of Giampietro's Residence October 2018
- Documents Relating to Physical Surveillance Conducted During the Course of Investigation Documents
- All Physical Evidence Collected from Giampietro's Residence has been made available for inspection and review
- Physical Evidence that Giampietro gave to the Undercover Employee has been made available for inspection and review
- Audio Recordings of Meetings between Giampietro and the Undercover Employee and of the FBI interview of Giampietro have been made available for review at the USAO since approximately November 14, 2019
 - Meeting on November 28, 2017
 - Meeting on February 22, 2018
 - Meeting on March 17-18, 2018
 - Meeting on June 25, 2018

- FBI interview on October 23, 2018

Production 3 (consisting of six (6) binders representing Binders 7-10C, which includes three (3) discs, made available to Defense counsel on December 20, 2019, and produced on December 23, 2019):

- One CD containing approximately eighteen (18) voice messages left by Giampietro
- One Subpoena return for telephone number associated with Giampietro with CD
- One court order return for Facebook social media accounts with CD
- Online chat with Giampietro, Feb 21 - March 20, 2018
- Online chat with Group, March 12-15, 2018
- Online chat with Group, March 22-23, 2018
- Online chat with Group, March 1-2, 2018
- Online chat with Giampietro, Feb 22, 2018
- Online chat with Giampietro, Aug 13-20, 2018
- Text messages with Giampietro, Dec 17, 2017 - Jan 18, 2018
- Online chat with Group, Oct 1, 2018
- Online chat with Group, March 4, 2018
- Online chat with Group, Feb 24-26, 2018
- Online chat with Group, Feb 26-28, 2018
- Online chat with Giampietro, May 16, 2018
- Online chat with Group, March 19-20, 2018
- Online chat with Group, March 2-22, 2018
- Online chat with Group, March 11-12, 2018
- Online chat with Group, March 3 - May 25, 2018

Production 4 (consisting of documents only and representing Binder 11, which was made available to Defense counsel on January 22, 2020, and provided to counsel on January 23, 2020):

- Law Enforcement Letters and corresponding results (totaling approximately 1,000 pages of material) from the following:
 1. Microsoft
 2. Experian
 3. Facebook
 4. Transunion
 5. Equifax
 6. Verizon Wireless
 7. Ben Lomand
 8. AT&T
 9. Myspace
 10. Instagram
 11. Dekalb Telephone
 12. Capitol One
 13. Bank of America

Production 5 (consisting of slightly less than 600 pages of material described below and four (4) discs representing Binder 12, which was made available and provided to Defense counsel on or about February 21, 2020):

- Law enforcement information on Georgianna Giampietro online activities and other data September 16, 2015
- Online chats with Giampietro from November 4, 2015
- Voicemail from Giampietro December 14, 2016
- Online chats with Giampietro October 24, 2016, and video attachment
- Property and utility records for home address
- Online chats between September 12, 2018 and October 3, 2018
- Online chats between October 20, 2016 and October 21, 2016
- Online chats October 25, 2016
- Online chats April 2016
- Record of FBI purchase of computer tablet April 30, 2016

- Record of Giampietro's yard sale April 30, 2016
- Online chats from December 7, 2015 to December 9, 2015
- Open source identifying information captured January 21, 2016
- Online chat concerning debt May 25, 2017
- Online chats April 6, 2017 to April 8, 2017, and video attachment
- Online chats May 5, 2017 to May 6, 2017, and voicemail attachment
- Online activities of Giampietro from November and December 2015
- Online chats May 29, 2017 to May 31, 2017
- Online chats February 11, 2017 to February 14, 2017
- Online chats February 4, 2017
- Online chats November 17, 2015 to November 19, 2015
- Online chats November 10, 2016 to November 11, 2016
- Email documenting Giampietro Instagram contact September 22, 2015

Production 6 (consisting of approximately 4.38 Gigabytes of data and representing Binder 13, which was made available and provided to Defense counsel on or about February 25, 2020):

- Screen Shots of social media accounts
- PDF documents on donations
- Twitter account information
- Search Warrant Returns for Facebook
- Search Warrant returns for Google
- Facebook Business Return
- Affidavit

- Facebook Search Warrants
- Google Search Warrant
- Investigative report documents
- Transcripts and Chats
- Western Union Documents

Production 7 (consisting of the items documented below and representing Binder 14, which was made available and provided to Defense counsel on or about March 3, 2020):

- Transcript for Undercover meeting on November 28, 2017
- Transcript for Undercover meetings from March 17, 2018 and March 18, 2018
- List and photographs of Items provided to Undercover from Giampietro
- Record of consensual recording from November 28, 2017 meeting
- Record of consensual recording from March 17, 2018 and March 18, 2018 meetings
- Courier Journal article

Production 8 (consisting of the items documented below (contents from the UC phone totaling approximately 737 pages) and representing Binder 15, which was made available and provided to Defense counsel on or about March 16, 2020):

- Call Log Data: Contact with Giampietro
- Chat Log Data: Contact with Giampietro
- SMS Log Data: Contact with Giampietro
- Photo and Attachments Exchanged with Giampietro
- Call Log for Operational Logistics
- Screenshot of Receipts Exchanged with Giampietro
- Miscellaneous Photos

Production 9 (consisting of the items documented below, including two (2) discs and approximately 886 pages of documents, and representing Binder 16, which was made available and provided to Defense counsel on or about March 20, 2020):

- Giampietro online channel captures from May 15, 2018, to October 9, 2018
- A CD containing video and audio from online channel
- Document requesting Giampietro passport application
- Giampietro's Instagram account, online channel, and chats January 2018
- Public complaint to the FBI against Giampietro October 2017
- Giampietro's postings on online channel and chats in July 2017
- Chats with Giampietro July 2017
- Interview with Maria Williams January 29, 2019
- Documentation of Government financial assistance provided to Giampietro
- Arrest documentation
- Initial appearance document
- Post arrest transportation document
- Documentation of screenshots obtained from search warrant
- Giampietro's Instagram and online accounts
- Open source article on Merciful Hands
- Surveillance document July 15, 2019
- Giampietro's online account captures
- Online group chats March 2018
- A CD containing voicemail from Giampietro
- Information from New York District Attorney's Office
- Transcript from June 25, 2018, undercover meeting with Giampietro

Production 10 (consisting of the items documented below, including eleven (11) discs and approximately 1,548 pages of other documents, and representing Binder 17, which has been made available to Defense counsel on March 27, 2020):

- AT&T returns for Giampietro's phone
- Whatsapp return for Giampietro's phone
- Voice messages left by Giampietro on group chats March 2018
- Text messages with Giampietro from November 24–28, 2017
- Western Union Results November 12, 2019
- Online chats with Giampietro October 2016
- Online chats with Giampietro April 2018
- Photos of Postal Packages sent to Giampietro
- Employment check on Giampietro March 2018
- Online chat with Giampietro April 2018
- Gofundme page information
- Online chat with Giampietro August 2018
- Online chat with Giampietro October 2018
- Online chat with Giampietro October 2018
- Online chat with Giampietro October 2018
- Online chat with Giampietro's contact in Syria
- Online chat with Giampietro and video October 2018
- Online chat with Giampietro October 2018
- Authorization to transport a minor (FBI form)
- Online chat with Giampietro October 2018

- Online chat with Giampietro October 2018
- Online chat with Giampietro October 2018
- Online chat with Giampietro October 2018
- Interview of Maria Williams October 23, 2018
- Merciful Hands channel collections with CD
- Jail calls August 17-18, 2019 with CD
- Jail calls August 19-22, 2019 with CD
- Jail calls August 22-28, 2019 with CD
- Jail calls August 28, 2019 to September 9, 2019 with CD
- Jail calls September 10-17, 2019 with CD
- Jail calls September 17-22, 2019 with CD
- FBI 302s (review of jail calls)
- Documentation of money sent to Giampietro
- Open source information on UK women pleading guilty to donating money to Merciful Hands
- MTSU schedule and course information for Giampietro
- Instagram screenshot
- Online profile and screenshots
- Text messages with Giampietro
- Voicemail documentation
- Online group chat March 15-19, 2018
- Online group chat March 3, 2018

- Investigative searches for Giampietro's communications with law enforcement
- Open source reporting on Merciful Hands
- Online text communications with Giampietro from January 8, 2018 to September 30, 2018

Respectfully submitted,

DONALD Q. COCHRAN
United States Attorney
Middle District of Tennessee

By: s/ **Philip H. Wehby**
PHILIP H. WEHBY
Assistant United States Attorney
110 9th Avenue South, Suite A-961
Nashville, Tennessee 37203
(615) 736-5151

By: s/ **Ben Schrader**
BEN SCHRADER
Assistant United States Attorney
110 9th Avenue South, Suite A-961
Nashville, Tennessee 37203
(615) 736-5151

By: s/ **Jennifer Levy**
JENNIFER LEVY
Trial Attorney
Counterterrorism Section
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Suite 7600
Washington, D.C. 20530
(202) 514-1092

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2020, I have forwarded a copy of the foregoing document, via the Court's electronic filing system, to Peter J. Strianse, Esq., and Charles D. Swift, Esq., counsel for the defendant.

s/ Philip H. Wehby
PHILIP H. WEHBY
Assistant United States Attorney